

ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law
100 Lafayette Street, Suite 501
New York, NY 10013

Franklin A. Rothman
Jeremy Schneider
Robert A. Soloway
David Stern

Tel: (212) 571-5500
Fax: (212) 571-5500

Rachel Perillo

November 16, 2023

By ECF

Hon. Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Ademola Adebogun,
19 Cr. 291 (LAP)

Dear Judge Preska:

Robert Soloway and I are the attorneys for Ademola Adebogun in the above-named matter, having been appointed pursuant to the Criminal Justice Act. Mr. Adebogun is currently on supervised release and respectfully requests a temporary modification of his travel restrictions to permit international travel to Nigeria for three weeks for the purpose of visiting with his mother and other close family members. Mr. Adebogun's U.S. Probation Officer, Sabrina Gargano, has no objection to this request. The government, by AUSA Rebecca Dell, takes no position.

As way of background, on September 7, 2022, the Court sentenced Mr. Adebogun to time served followed by three years of supervised release with six months on home confinement based upon his plea of guilty to Attempt and Conspiracy to Commit Wire Fraud in violation of 18 U.S.C. § 1349. Mr. Adebogun completed his term of home confinement in approximately April 2023 and remains on supervised release. He resides in Brooklyn, New York with his partner and their two young children, and he has another young child that resides in New Jersey whom he sees on a weekly basis. Officer Gargano indicates that Mr. Adebogun is in compliance with the terms of his supervised release.

As the Court may remember from sentencing, Mr. Adebogun is a dual citizen of the United States and Nigeria. He was born and raised in Nigeria and has lived in the United States, New York City in particular, for over twenty years. Mr. Adebogun's mother, maternal half-siblings and several other family members reside in Lagos, Nigeria. The last time that Mr. Adebogun saw his mother was while on pretrial release in 2019 when, with the Court's

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permission, he traveled to Nigeria for the purpose of attending his father's memorial service. Aside from a general desire to visit with his family that he has not seen in over four years, Mr. Adebogun especially wishes to visit his mother, who is in her late sixties and is exhibiting symptoms of dementia. Mr. Adebogun's travel restrictions prohibit him from traveling outside of the country without the Court's approval. He therefore seeks the Court's permission to travel to Nigeria to visit with his mother and extended family.

If this application is granted, Mr. Adebogun would like to travel to Nigeria for approximately three weeks beginning in the end of December 2023 or early January 2024.¹ Mr. Adebogun would provide Probation with his full travel itinerary and lodging information, and would coordinate with Pretrial Services for the pickup and return of his U.S. Passport, #520658796, Date of Expiration, October 14, 2024.

If the Court has any questions regarding this application please do not hesitate to contact me. The Court's time and attention to this matter is appreciated.

The travel is approved.

Respectfully submitted,

SO ORDERED

Loretta A. Preska

LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE

cc: AUSA Rebecca Dell (by ECF)
AUSA Daniel Wolf (by ECF)

Rachel Perillo

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11/24/23

¹ Mr. Adebogun has not yet purchased his airfare and does not intend to do so unless the Court grants this application. Therefore, the precise dates of his desired travel have not yet been determined.